

**IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA
CRIMINAL**

COMMONWEALTH OF PENNSYLVANIA	: No. CP-14-CR-2421-2011;
	: CP-14-CR-2422-2011
vs.	: .
	: .
GERALD A. SANDUSKY	: .

AMENDED BILL OF PARTICULARS

AND NOW, May 18, 2012, the Commonwealth of Pennsylvania, by Linda Kelly, Attorney General for the Commonwealth of Pennsylvania, Frank G. Fina, Chief Deputy Attorney General, and Jonelle H. Eshbach, Senior Deputy Attorney General, respectfully files the following Amended Bill of Particulars. All information provided to the best of the Commonwealth's knowledge, information and belief.

VICTIM 1

- a. The offenses (including, but not limited to, oral sex and indecent contact) occurred on various dates between June 2005 and September 2008 (the oral sex between June 2007 and September 2008) at Defendant's home (130 Grandview Road, State College, Pennsylvania, 16801), the Hilton Garden Inn on East College Avenue in State College, the Central Mountain Middle School in Clinton County and elsewhere. Exact dates are unknown.
- b. The exact age of the Victim 1 spans ages 11 through 15.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact times and dates.

VICTIM 2

- a. The date of this offense is on or about February 9, 2001, in the evening, at the Lasch Football Building on the University Park campus on the Penn State University.
- b. The exact age of Victim 2 is unknown.
- c. The identity of Victim 2 is unknown, therefore, the exact age of Victim 2 is unknown.

VICTIM 3

- a. The offenses occurred on various dates between July 1999 and December 2001 at Defendant's home and in the Lasch Building on the University Park campus of the Penn State University. Exact dates are unknown.
- b. The exact age of Victim 3 spans ages 12 through 14.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the offenses, is unable to provide exact times and dates.

VICTIM 4

- a. The Defendant, in the first half of 2000, engaged in involuntary deviate sexual intercourse with juvenile Victim 4 by performing anal sex on juvenile Victim 4 in the Lasch Building on the University Park campus of the Penn State University.
- b. The Defendant, did, in excess of 25 times, on various dates between October 1996 and December 2000, engage in involuntary deviate sexual intercourse with juvenile Victim 4 by compelling juvenile Victim 4 to perform oral sex upon him at Defendant's home, in the East Area Locker Building and Lasch Building on the University Park campus of the Penn State University, and elsewhere.
- c. The Defendant, did, on various dates in 1999, engage in aggravated indecent assault of juvenile Victim 4 who was less than sixteen years old by digitally penetrating Victim 4's anus at Defendant's home, in the East Area Locker Building and Lasch Building on the University Park campus of the Penn State University, and elsewhere.

- d. All of the offenses (including, but not limited to, those listed above as well as indecent contact) occurred on various dates between October 1996 and December 2000, at Defendant's home, in the East Area Locker Building and Lasch Building on the University Park campus of the Penn State University, at Toftrees Resort and elsewhere. These amount to over 50 occurrences. Exact dates are unknown
- e. The exact age of Victim 4 spans ages 12 through 17.
- f. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the offenses, is unable to provide exact times and dates.

VICTIM 5

- a. The offenses occurred in August of 2001. Location of the offenses was in the Lasch Building on the University Park campus of the Penn State University.
- b. The exact age of Victim 5 was 12 or 13 (date of birth is 08/08/88).
- c. The victim, a child at the time of the offenses, is unable to provide the exact time and date.

VICTIM 6

- a. The offense was committed on May 3, 1998 between 7 o'clock p.m. and 9 o'clock p.m. at the locker/shower room of Lasch building.
- h. The exact age of Victim 6 was 11 years old.
- c. Not applicable.

VICTIM 7

- a. The Defendant, did, on various dates between September 1995 and December 1996, attempt to have indecent contact with Victim 7 or cause Victim 7 to have indecent contact with him at Defendant's home and in the East Area Locker Building on the University Park campus of the Penn State University.
- b. The exact age of Victim 7 was 9 to 11 years of age.

- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact times and dates.

VICTIM 8

- a. The offenses occurred between the dates November 20 and November 27, 2000, Thursday or Friday evening, on a weekend when the football team had an away football game. The offenses occurred in the assistant coach's locker room of the Lasch Building, University Park campus.
- b. Exact age of the Victim 8 is unknown; eyewitness places victim's age at between 11 and 13 years.
- c. The Commonwealth is unable to provide the exact age of the alleged victim because the identity of the alleged victim is unknown.

VICTIM 9

- a. The Defendant, did, on various dates between July 2005 and December 2008 at Defendant's home, commit offenses (including, but not limited to, oral sex, anal sex and indecent contact) on numerous occasions with juvenile Victim 9 at Defendant's home, the Hilton Garden Inn on East College Avenue in State College and elsewhere.
- b. The exact age of Victim 9 spans age 12 to 15.
- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact dates and times.

VICTIM 10

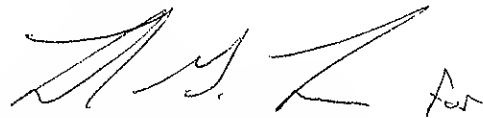
- a. The offenses (including, but not limited to, oral sex and indecent contact) occurred on various dates between September 1997 and July 1999 at Defendant's home, the outdoor pool at University Park and in Defendant's car.
- b. The exact age of Victim 10 spans ages 10 to 12.

- c. The Commonwealth is unable to provide specific dates because there were numerous offenses over the course of several years. The victim, a child at the time of the crimes, is unable to provide exact dates and times.

Respectfully Submitted,

**LINDA KELLY
Attorney General**

By:

A handwritten signature in black ink, appearing to read 'J. Eshbach', written over a horizontal line.

**JONELLE H. ESHBACH
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Date: May 18, 2012